

Ladies and Gentlemen of the FCC:

The considerations under examination for proposal 02-277 are so onerous as to be almost worthy of disbelief. I would urge you to look at not merely what has occurred in radio (due to its stultifying insipidities, I have not watched television for 20 years and so cannot really comment on it) in regards of its aggressive capture by corporations, nor just at its audience, but also its lamentably bland and catholic content.

Radio preceded television folklorically as an entertainment form, but was actually a highly planned business device (refer to Nicholas Von Hoffman's marvelous book, *Capitalist Fools*, for a capsule genesis). Despite that, it contained a proliferation of highly entertaining programming. When television came along, it was forced to change its venue from sonic versions of what television presented over to music programming, commentary, and other forms of information/entertainment.

I am a writer and music critic (presently, for *E/I* and *Progression* magazines) and began my love for music via the radio. In the 60's and 70's, disc jockeys, to a very large extent, determined what would be played in their time slots. This made for a good deal of personality within each show and, due to the eclecticism of many of the DJ's, prompted exposure to musics the listener was not aware of. There were also "underground" stations, which played far more exotic sounds than the standard stations, having not only the very slightest obligations to business. Between these two, I and many developed a quite broad love of music.

Over the years, the corporate presence became ever more noxious. The payola scandals of the times are indicative of what was occurring: labels and distributors began providing various forms of remuneration for given numbers of "plays" for their "singles". At first, this was restricted to the disc jockey. Though that was problematic enough, it nonetheless still allowed the DJ to, on the one hand, supplement his meager income and, on the other hand, play what he wished above and beyond what he was paid to play. Management saw all this and soon decided it wished to appropriate those dollars for itself. Eventually, though the usual hierarchical evolutions, this led to what we see now: 24-hour-a-day predetermined playlists of a minute portion of available musics.

I, and many, abandoned music radio.

I switched to talk radio, which, when I did so, had a fairly decent array of left, right, and center hosts and programs. I listened for many years and, when I wanted music, I played a cassette of my own programmed anthologies of songs (music radio was, and is, so execrable, that I could not listen for more than ten minutes). However, the political presence of corporations became increasingly strong as I listened to talk radio and a prevalence of right wing personalities began to slowly dominate airwave colloquy.

After 9/11, there was what I term a Sprint To The Right, which gained its fullest expression at the outset of the Iraq "War", wherein radio became a virtual stewpot of right wing propaganda. Even much of NPR's programming, usually left and center, was instantly pre-empted to provide a plethora of coverage decidedly at odds with the service's norms, stifling intelligent dissent on the "war" and its many issues. NPR's *raison d'être* became that of being a bizarre amalgam of rapidly changing pastiches taken mainly from BBC and CNN sources, something it had never done in its history, that I'm aware of, nor even vaguely approximated, and which was echoed nowhere else on the radio dial.

In sum, then, what constitutes the radio menu for the citizen now? A captivity to hideously narrow music cues to exceedingly narrow consumption and a forum for right-wing agitprop. I should mention that this 'right wing' element is not an intelligent exposure of true conservative thought (along the line, say, of the near-unanimous contingent of military generals and other experts who were in no way supportive of the Iraq invasion) but almost totally a retinue of yammering self-sellers modeling themselves after the commercial success of Rush Limbaugh, perhaps the most lamentable personality on radio.

All this monopolization of radio (the media used to be owned by about 350 people, now that number is about apparently 6, by most estimates) does not even serve its ill-planned corporate ends. As has been seen, CD sales are dropping rapidly, radio shows have to constantly scramble to find new ways to hang on to listeners, and the listeners themselves are searching out new forms of entertainment. Kids turn to video games where once they listened to music, adults...well, I'm not sure what they're doing to substitute for old habits, but they certainly aren't turning on the radio like they used to. Stations constantly change format entirely, trying to discover what needs to be done to capture an audience.

The solution is simple: effect legislation that is not looser on determinations of diversity of ownership, but much much tighter. That will re-introduce a commodity all but lost in this purportedly capitalistic venue: competition. That's what America has lost in its radio diet: the sharp edge that keeps evolution alive, competition. If I have to spell out for the FCC why that is a good thing, then the situation is FAR more hopeless than even I, an irrescuable cynic, have determined.

You are adults, you are professionals, your very jobs center on media and the promotion of its growth, not to mention what should be the preservation of the airwaves for its owners (the public, which long ago was all but shorn of that ownership via your many odd rulings and concessions to corporations); if you do not see this, then there is indeed no hope and all the present "controversy" is just the usual window dressing, a catalog of sophistries designed to lull the public while the FCC yet again plays handmaiden to a minute handful of corporations who wish nothing less than monopoly.

With all due respect, this present sickness of the form has not come about due to any lack of people who might provide a highly diverse wealth of entertainment but because the FCC itself long ago initiated the practice of strangling that selfsame treasure-trove of artistically diverse voices and venues. The FCC provided the gantry from which business hegemonies could absorb the public's property and make it their personal playground for sonic billboarding and political indoctrination.

I wish I could cozen and placate you with the usual over-polite elliptical philosophizings that you receive from others, which attend to a million and one impertinences, carefully avoiding what each speaker truly knows to be the root of the dilemma, but I cannot. Through my former love of the medium and my grasp of both American and capitalist virtues, I must oppose this sea of craven facilitations and inform you that neither the medium nor those populating it, nor even the corporations are the culprits here: you, the FCC, are.

The solution should already be overwhelmingly evident to all of you: do NOT further your depredations upon law, its spirit, and the social good: do NOT seek weak reasons to ever more timorously allow corporations to monopolize the

airwaves: and do NOT consider that a withdrawal of this present proposal would effect what should rightly be done. Instead, IMMEDIATELY begin to reverse your years-long erosion of the necessities to keep the radio waves as competitive and diverse as possible. Dismantle all the rules that allow predatory consumption of the airwaves into as few owners as possible. Make it impossible for corporations to weasel in under clever subsidiary titles. Craft laws that allow only one station to any owner, no matter how cleverly overhauled that owner may be. Originate rules that return a respectable portion of the airwaves directly to the public and allow only non-business, non-corporate ownerships, serving the public and artistic interests of communities, rather than business dictates.

I should not have tell you your business, but I do. You long ago gave up any pretense of being an autonomous bureaucracy serving the public good and became a handmaiden to gluttonous corporations. The salvation of radio lies not with radio itself but with its former gatekeeper, now a subservient facilitator for monopoly, the FCC. Deep down, you already know what needs to be done, I do not have to tell you; I suggest you do it.

Yours,

Mark S. Tucker